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October 9, 2006

California Building Standards Commission
2525 Natomas Park Drive, Suite 130
Sacramento, California 95833
Attention: Dave Walls, Executive Director

Re: REGARDING THE ADOPTION BY REFERENCE OF THE
2006 EDITION OF THE INTERNATIONAL BUILDING CODE (IBC)
INTO THE CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 2

Dear Mr. Walls:

I have the following comments and request these changes be made to **Chapter 11B** of the proposed 2006 California Building Code or in the alternative put on the agenda for Board consideration:

1. There currently is no provision in the CBC to allow for new technology. I propose the same language from the ADA, as follows, be included:

Equivalent Facilitation. Departures from particular technical and scoping requirements of this code by use of other designs and technologies are permitted where alternative designs and technologies used will provide substantially equivalent or greater access to and usability of the facility.

Currently equivalent facilitation is only permitted when it's technically infeasible to comply, not if there better or different technology.

2. Section 1110B.1.3 –**Check stands**- I propose this be modified to not require the sign..."shall be identified by a sign clearly visible to those in wheelchairs. The sign shall display the international symbol of accessibility in white on a blue background and shall state "This check stand to be open at all times for customers with disabilities", if all check stands are accessible.
3. Section 1111B.4.1 – **Distributing accessible motel rooms**- Add "to the maximum extent feasible".
4. Section 1115B.2.1.2.2 – **Insulating waste and supply pipes**- Add "or located in such a fashion that no one in a wheelchair could touch the pipes".
5. Section 1115B.7.1- **Multi- Accommodation Stalls**- Change 18" from centerline of water closet to the wall, to 16"-18" from wall. This is consistent with new ADAAG and eliminates enormous day-to-day issues.

6. Section 1115B.9.3 – **TP Dispensers**-Add “these dispensers are not protruding objects when mounted on the wall surface”.
7. Section 1116B-**Elevators**- I would like to see the new “Destination” elevator technology included in this section;
8. Section 1117B.5.7 – **Mounting Height and Location**- Add the words “Where permanent **tactile** identification signs...”.
9. Section 1117B.5.8.1.2 – **Entrance Signs** – Add “ when not all primary entries are accessible”.
10. Section 1122B – **Fixed or Built in Seating, tables and counters** – Add “this section does not cover freestanding furnishings, but is intended for built in seating, tables and counters.” This is an enormous issue in the field.
11. Section 1124B.3 **Carpet**- Add wording to make clear this does not apply to “walk off mats” intended to reduce slipping.
12. Section 1129B.3 **Parking Space size**- Add “Dimensions are from center of line to center of line”.
13. Section 1129B.4 **Identification of Parking Spaces**- Change “have an additional sign stating van accessible, mounted...” to “have additional wording stating van accessible, mounted...”;
14. Section 1129B.3.3 **Arrangement of parking space**. Add “ In each parking area, **if required**, a bumper or curb shall be provided and located to prevent encroachment of cars over the required width of walkways.
15. Section 1132B- **Boat Docks** – How and to what standard “shall be accessible”.
16. Section 1133B.1.1.1.1 (4) – **Entrances**- Remove the word “existing” buildings. All buildings should have this option.
17. Section 1133B.2.3.2 **Automatic Doors** – Add “Automatic doors are acceptable mitigation for level landings and strike side clearance requirements.”
18. Section 1133B.4.2.5 **Handrails**- A range is required. The requirement of 1-1/2” is not possible on textured surfaces;
19. Section 1133B.5.3 **Ramp Slope** – Slope should be determined by the overall ramp, not if you can find a point in the ramp that is more than 8.33%;
20. Section 1133B.5.5.1 **Ramp Handrails**- Change to add “and” after *except that at exterior door landings* **and** *handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length*. This is consistent with ADAAG and the intent of the section is clearer.
21. 1133B.8.5 **Detectable Warnings** – “Hazardous” vehicular areas are not sidewalks or walkways that cross driveways or paths of travel in parking lot areas;

22. Figures should be modified to reflect any above impacts;

I have the following comments and request these changes be made to **Chapter 11A** of the proposed 2006 California Building Code:

1. Section 1109A.8.8- **Parking Signage**- Change “have an additional sign stating van accessible, mounted...” to “have additional wording stating van accessible, mounted...”;
2. Section 1114A.6.1 **Ramp Handrails**- Change to add *d handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length*. This is consistent with ADAAG and the intent of the section is clearer.
3. Section 1114A.6.2.4 and 1122A.5.2.4- **Handrails** - A range is required. The requirement of 1-1/2” is not possible on textured surfaces;
4. Section 1122A.2 **Ramp Slope**- Slope should be determined by the overall ramp, not if you can find a point in the ramp that is more than 8.33%;
5. Section 1122A.5.1 **Ramp Handrails**- Change to add *d handrails are not required on ramps less than 6 inches (152 mm) rise or 72 inches (1829 mm) in length*. This is consistent with ADAAG and the intent of the section is clearer.
6. Section 1124A- **Elevators**- I would like to see the new “Destination” elevator technology included in this section;
7. Section 1127A.2.2.3- **Accessible Water Closet** - Change 18” from centerline of water closet to the wall, to 16”-18” from wall. This is consistent with new ADAAG and eliminates enormous day-to-day issues.
8. Section 1127A.3.5 **Plumbing Protection** - Add “or located in such a fashion that no one in a wheelchair could touch the pipes”.
9. Section 1127A.12 - **Fixed or Built in Seating, Tables and Counters** – Add “this section does not cover freestanding furnishings, but is intended for built in seating, tables and counters.” This is an enormous issue in the field.
10. Section 1143A.10- **Mounting Height and Location**- Add the words “Where permanent **tactile** identification signs...”.

My comments regarding the **USDOJ Certification of the Accessibility Standards** found in CCR , Title 24 are the same as the comments above.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Kim R. Blackseth', with a stylized, flowing script.

Kim R. Blackseth, ICBO, ACD

State Of California Building Standards Commissioner
International Conference of Building Officials # 1085694-12
Academy Certified Diplomat
ICC Certified Accessibility Inspector/Plans Examiner #20112

Member of the Western Region Master Builders Association
California General Building Contractor # 363311, since 1978
Member of the Marin Builders Exchange